

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATHRYN TOWNSEND GRIFFIN, HELEN :
MCDONALD, and THE ESTATE CHERRIGALE :
TOWNSEND, :
:

Plaintiffs, :

-against- :

EDWARD CHRISTOPHER SHEERAN, p/k/a ED :
SHEERAN, ATLANTIC RECORDING :
CORPORATION d/b/a ATLANTIC RECORDS, :
SONY/ATV MUSIC PUBLISHING, LLC and :
WARNER MUSIC GROUP CORPORATION :
d/b/a ASYLUM RECORDS, :

Defendants. :
----- X

Docket No. 17-cv-5221 (RJS)

DECLARATION OF
PATRICK R. FRANK
in Opposition to Defendants'
Ninth Motion *in Limine*

Patrick R. Frank declares that the following statements are true:

1. I am a partner at Frank & Rice, P.A., counsel(s) for the Plaintiffs in this action. I have personal knowledge of, and am fully familiar with, the facts set forth in this Declaration. I respectfully submit this Declaration in opposition to Defendants' Ninth Motion *in Limine*, seeking to exclude evidence and/or testimony at trial relating to the Defendant's, Ed Sheeran's, concert revenues.

2. Annexed as **Exhibit "1"** is a true copy of the First Request for Production Served upon counsel(s) for the Defendant, Ed Sheeran, on or about October 14, 2017, attendant to this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 28, 2023



PATRICK FRANK